

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

TROUT POINT LODGE, LIMITED,
A Nova Scotia Limited Company;
VAUGHN PERRET and
CHARLES LEARY,

Plaintiff, Civil Action No.: 1:12-CV-90LG-JMR

v.

DOUG K. HANDSHOE,

Defendant.

* * * * *

STATEMENT OF UNCONTESTED MATERIAL FACTS

NOW INTO COURT, through undersigned counsel, come defendants, Douglas Handshoe and Slabbed New Media, LLC, and respectfully submit their Statement of Uncontested Material Facts as follows:

- 1) Slabbed New Media, LLC and Douglas Handshoe own a blog on which Handshoe reports about various political issues that impact the Gulf Coast.
- 2) Plaintiffs co-owned and/or managed a property in Nova Scotia, Canada, which former Parish President of Jefferson Parish, Aaron Broussard, owned.
- 3) Defendants did not appear or defend themselves in the Canadian defamation lawsuit.
- 4) Canadian law does not currently provide freedom of speech protection that rises to the level of that provided by United States law.
- 5) Canadian law does not require public figures to prove actual malice in order to prevail in a defamation action.
- 6) Canadian law does not require a plaintiff to prove falsity in order to prevail in a defamation action.

- 7) Plaintiffs did not prove falsity of Handshoe's statements in the Canadian proceeding.
- 8) Plaintiffs were sued by the Atlantic Canada Opportunities Agency.
- 9) Plaintiffs are avowed homosexuals engaged in a relationship.
- 10) A story ran in the March 2002 issue of Rural Delivery Magazine detailing plaintiffs' unethical business practices with Canadian milk producers.
- 11) Defendants have not conducted any business in Canada nor have any of the comments of Handshoe on Slabbed been directed to or designed to influence any public opinions in Canada.

Respectfully submitted,

THE TRUITT LAW FIRM

A Limited Liability Company

S/Jack E. "Bobby" Truitt

JACK E. TRUITT, BAR NO. 18476

149 North New Hampshire Street

Covington, Louisiana 70433

Telephone: (985) 327-5266

Facsimile: (985) 327-5252

Email: mail@truittlaw.com

Counsel for defendants, Slabbed Media, LLC and

Douglas Handshoe

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been duly served on all counsel of record by depositing same into the U.S. Mail, postage pre-paid, this June 28, 2012, or by any other means authorized by law.

S/Jack E. "Bobby" Truitt
